

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue
Pharma L.P.*, Case No. 18-OP-45090
(N.D. Ohio);
County of Cuyahoga v. Purdue Pharma L.P.,
Case No. 17-OP-45004
(N.D. Ohio)

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DEFENDANT NORMACO, INC.'S JOINDER TO CERTAIN SUMMARY JUDGMENT
MOTIONS FROM WHICH IT WAS INADVERTENTLY EXCLUDED**

Noramco hereby joins the following motions in which it was inadvertently excluded from the list of moving defendants: (1) The Manufacturer Defendants' Motion for Summary Judgment on Plaintiffs' Public Nuisance Claims (*see* Dkt. 1761), and (2) The Manufacturer Defendants' Motion for Summary Judgment for Plaintiffs' Failure to Offer Proof of Causation (*see* Dkt. 1771).¹

¹ In the Complaints, Plaintiffs lump Noramco together with Johnson & Johnson and its other affiliated entities, all Manufacturer Defendants, or all Defendants collectively. For this reason, Noramco joins these two motions even though it never manufactured, packaged, branded, marketed, promoted, distributed or sold the finished drug products that are at issue in this litigation. Indeed, as to causation, because Noramco is an active pharmaceutical ingredient supplier, and not a finished drug product manufacturer, Plaintiffs' alleged injuries are even more remote and disconnected from the lawful activities of Noramco. Furthermore, as to public nuisance, there is *no evidence* that Noramco, an active pharmaceutical ingredient supplier, engaged in *any* wrongful conduct that might give rise to liability let alone conduct that could impose liability under a theory of public nuisance. *See* Noramco's Memorandum in Support of Motion for Judgment on the Pleadings or, in the Alternative, Summary Judgment (*see* Dkt. 1751).

Dated: June 28, 2019

Respectfully submitted,

/s/ Daniel G. Jarcho

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CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing **Defendant Noramco, Inc.’s Joinder to Certain Motions Summary Judgment Motions From Which It Was Inadvertently Excluded** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

Dated: June 28, 2019

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